

Scaling Facility-specific Decisions to the Statewide Level to Determine if Updating General Variance Treatment Requirements is Warranted (Example: > 1 MGD Category)

28 facilities (12 public, 16 private), 17 of which discharge at concentrations higher than WERF Level 3¹.

1. Significant Nutrients Test is applied to each facility. Would an upgrade to WERF level 3 for the facility lead to demonstrably improved water quality?



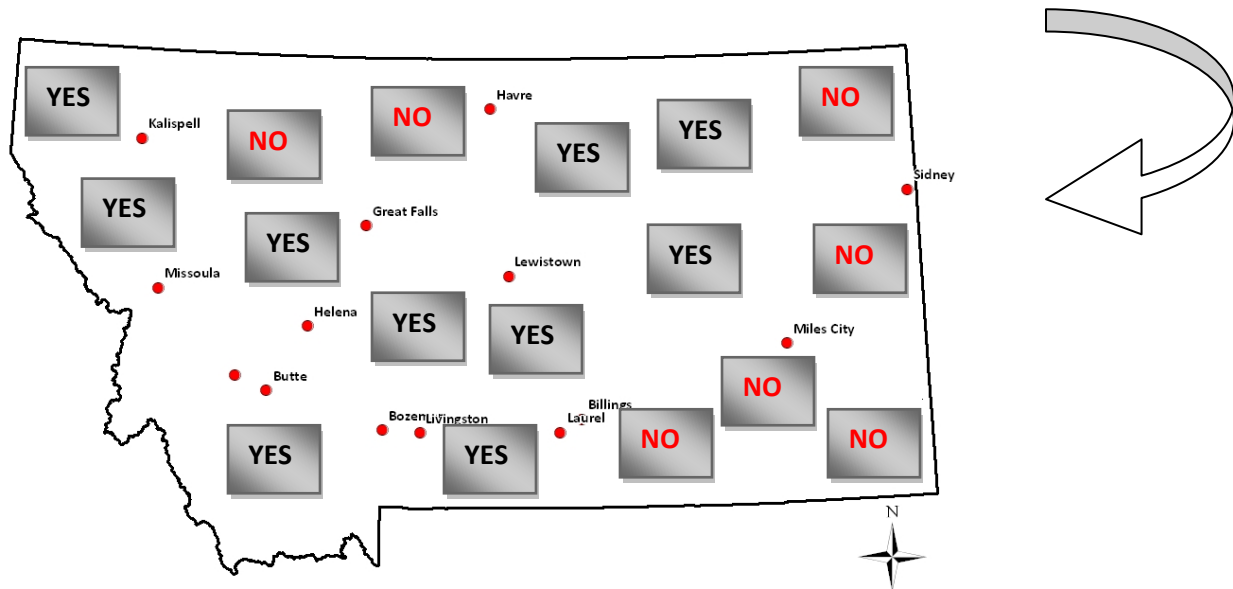
APPLY TEST TO THE FACILITY:
WILL UPGRADE LEAD TO
IMPROVED INSTREAM WATER
QUALITY?

YES

OR

NO

2. Results for each facility are considered together at the state scale to make a decision for the category:



If enough facilities are **NO**, test stops. If enough are **YES**, move to Economic Impact Test. “Enough” needs to be established by DEQ and NWG (50% of facilities in category? 30%? Other?).

3. Economic Impact Test: Estimate the cost for a public facility to move from WERF level 2 to level 3, then calculate this cost as a % of MHI. Do this for all. If median % MHI for the group of public dischargers reviewed is > **X** % MHI, it is too expensive, no change to the General Variance treatment requirement is made. If it is < **X** % MHI, the category’s treatment requirements update to WERF level 3 and these will be considered by Permitting at the next permit re-issuance. **X** % MHI needs to be defined.

¹ Only facilities discharging at concentrations higher than WERF level 3 (i.e., 5 mg TN/L and 0.2 mg TP/L) would be included because the General Variance for the >1 MGD category is currently at level 2 (10 mg TN/L and 1 mg TP/L).